1 Luke Andrew Busby, Ltd. 2 Nevada State Bar No. 10319 3 316 California Ave. Reno, NV 89509 4 775-453-0112 luke@lukeandrewbusbyltd.com 5 Attorney for the Plaintiff 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 9 10 COURAGE UHUMWNOMA OSAWE, 11 Plaintiff(s), Case No. 3:18-cv-00600-RCJ-WGC 12 vs. MOTION TO STRIKE FOR 13 DMV INVESTIGATOR JENNIFER **FAILURE TO REDACT** TINSLEY, DMV INVESTIGATOR CONFIDENTIAL 14 BRIAN BOWLES, DMV **INFORMATION** 15 INVESTIGATOR WILLIAM LYONS and DMV SERGEANT TODD 16 PARDINI; and JOHN DOES I through 17 X, inclusive 18 Defendant(s). 19 20 21 22 COMES NOW, COURAGE UHUMWNOMA OSAWE, ("Osawe" or "Plaintiff"), by 23 and through the undersigned counsel, and hereby files the following Motion to Strike For 24 Failure to Redact Confidential Information against DMV INVESTIGATOR JENNIFER 25 26 TINSLEY ("Tinsley"), DMV INVESTIGATOR BRIAN BOWLES ("Bowles"), DMV 27 INVESTIGATOR WILLIAM LYONS ("Lyons"), and DMV SERGEANT TODD

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PARDINI ("Pardini") (collectively "the Defendants"); and JOHN DOES I through X, inclusive.

This Motion is made and based upon all of the pleadings and records on file for this proceeding together with every exhibit that is mentioned herein or attached hereto (each of which is incorporated by this reference as though it were set forth hereat in haec verba), if any there be, as well as the points and authorities set forth directly hereinafter.

## MEMORANDUM OF POINTS AND AUTHORITIES

On February 26, 2019, the Defendants filed a Motion to Stay Discovery ("Motion") in this matter. (Doc #17). In Exhibit B to the Motion on page 6 of 17, the Defendants publicly filed the Plaintiff's drivers license number, social security number, and date of birth without redacting this information. FRCP 5.2 requires that such information be redacted before filing. LR IC 6-1 also requires that such redactions take place. LR IC 7-1 states that the Court may strike documents that do not comply with the rules for electronic filing.

WHEREFORE, the Plaintiff requests that the Court strike the Defendant's Motion to Stay Discovery (Doc #17) from the record and preclude the refiling of the Motion with the Court for violation of the provisions described above as permitted by LR IA 11-8.

Respectfully submitted this February 26, 2019.

By: \_\_\_\_\_

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Attorney for the Plaintif

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4	CERTIFICATE OF SERVICE
5	Pursuant to FRCP 5, I certify that on the date provided below, I caused service to be
6	completed by:
7	personally delivering;
8	delivery via Reno/Carson Messenger Service;
10	sending via Federal Express (or other overnight delivery service);
11	depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,
12	XXXX delivery via electronic means (ECF, fax, eflex, NEF, etc.)
13	a true and correct copy of the foregoing document addressed to:
15	AARON D. FORD
13	Attorney General
16	NATHAN L. HASTINGS (Bar No. 11593)
17	Senior Deputy Attorney General
	State of Nevada
18	Office of the Attorney General
19	555 Wright Way Carson City, NV 89711
20	(775) 684-4606 (phone)
	(775) 684-4601 (fax)
21	NHastings@ag.nv.gov
22	Attorney for Defendants
23	2 . 5
24	By: Dated: 2/26/2019  Luke Busby
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